UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PATRICIA BEJARANO,

Plaintiff,

1-27-16

Civ. No.: 15-CV-5906

ALL PRO HOME AND HEALTH CARE SERVICE, INC., aka MOHEGAN PARK HOME FOR ADULTS, aka NEW ROCHELLE HOME FOR adults, AKA 41 LOCKWOOD REALTY CORP., aka MARQUIS HOME CARE, LLC, ISRAEL ORZEL, Individually, CHRISTENCHER SEMPLE, Individually,

Defendants.

STIPULATION EXTENDING DEFENDANTS' TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

It hereby is STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their undersigned attorneys, who are authorized to enter into this Stipulation, that any obligation on the part of Defendants to answer, move, or otherwise respond to the Complaint in this matter is extended to and including January 29, 2016; and,

It is FURTHER STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their undersigned attorneys, who are authorized to enter this Stipulation, that Defendants, upon whom service was effected on October 16, 2015, hereby waive any defenses based on alleged defects in service of process, without prejudice to Defendants' position that some or all Defendants are not proper parties to the instant action.

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Ву:

JODI J. JAME, ESQ.

Dated: 1/2

JACKSON LEWIS P.C. ATTORNEYS FOR DEFENDANTS 58 South Service Rd., Ste. 250 Melville, New York 11747 (631) 247-0404

By:

NOEL P. TRIPP, ESQ.

Dated:

2016

SO ORDERED on this 27 day of January, 2016

United States District Judge

gr.

4825-2995-2812, v. 1